

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

L.E., by and through their parent and next friend, SARA CAVORLEY; B.B., a minor, by and through their parent and next friend, ELIZABETH BAIRD; A.Z., a minor, by and through their parent and next friend, JESSICA ZEIGLER; and C.S., a minor, by and through their parent and next friend, TARASHA SHIRLEY,

Plaintiffs,

v.

Civil Action No. 1:21-cv-04076-TCB

CHRIS RAGSDALE, in his official capacity as Superintendent of Cobb County School District; RANDY SCAMIHORN, in his official capacity, a member of the Cobb County Board of Education; DAVID BANKS, in his official capacity as member of the Cobb County School Board; DAVID CHASTAIN, in his official capacity as member of the Cobb County School Board; BRAD WHEELER, in his official capacity as member of the Cobb County School Board; JAHA HOWARD, in his official capacity as member of the Cobb County School Board; CHARISSE DAVIS, in her official capacity as member of the Cobb County School Board; LEROY TRE' HUTCHINS, in his official capacity as member of the Cobb County School

Board; and COBB COUNTY SCHOOL
DISTRICT,

Defendants.

DECLARATION OF JESSICA COLEMAN

This Declaration is given by Jessica Coleman who, under penalty of perjury pursuant to 28 U.S.C. § 1746, states that the following is true and correct:

1.

My name is Jessica Coleman. I am over twenty-one (21) years of age, legally competent to make this Declaration, and have personal knowledge of the statements made herein. I make this declaration on my own personal knowledge for use in supporting Defendants in the above-styled matter and for all other purposes permitted by law.

2.

I hold a specialist degree in educational leadership from Berry College. I have a master's degree in educational leadership from Kennesaw State University and a bachelor's degree in special education from the University of Georgia and a bachelor's degree in business administration from Kennesaw State University. I have 17 years of experience in education.

3.

I am currently employed as the director of special education compliance for the Cobb County School District (“CCSD”). I have served in this position for almost three years.

4.

Two of the named Plaintiffs have Section 504 plans and two have Individual Education Plans (IEPs).

5.

One of the named Plaintiffs has been fully vaccinated with the COVID-19 vaccine, and two of the other Plaintiffs are age-eligible to receive the vaccine. Only one of the Plaintiffs is currently ineligible to be vaccinated.

6.

All of the Plaintiffs are eligible to receive full educational services via a virtual learning program offered by the Cobb County School District. Only one of the Plaintiffs has chosen to participate in a virtual learning program.

7.

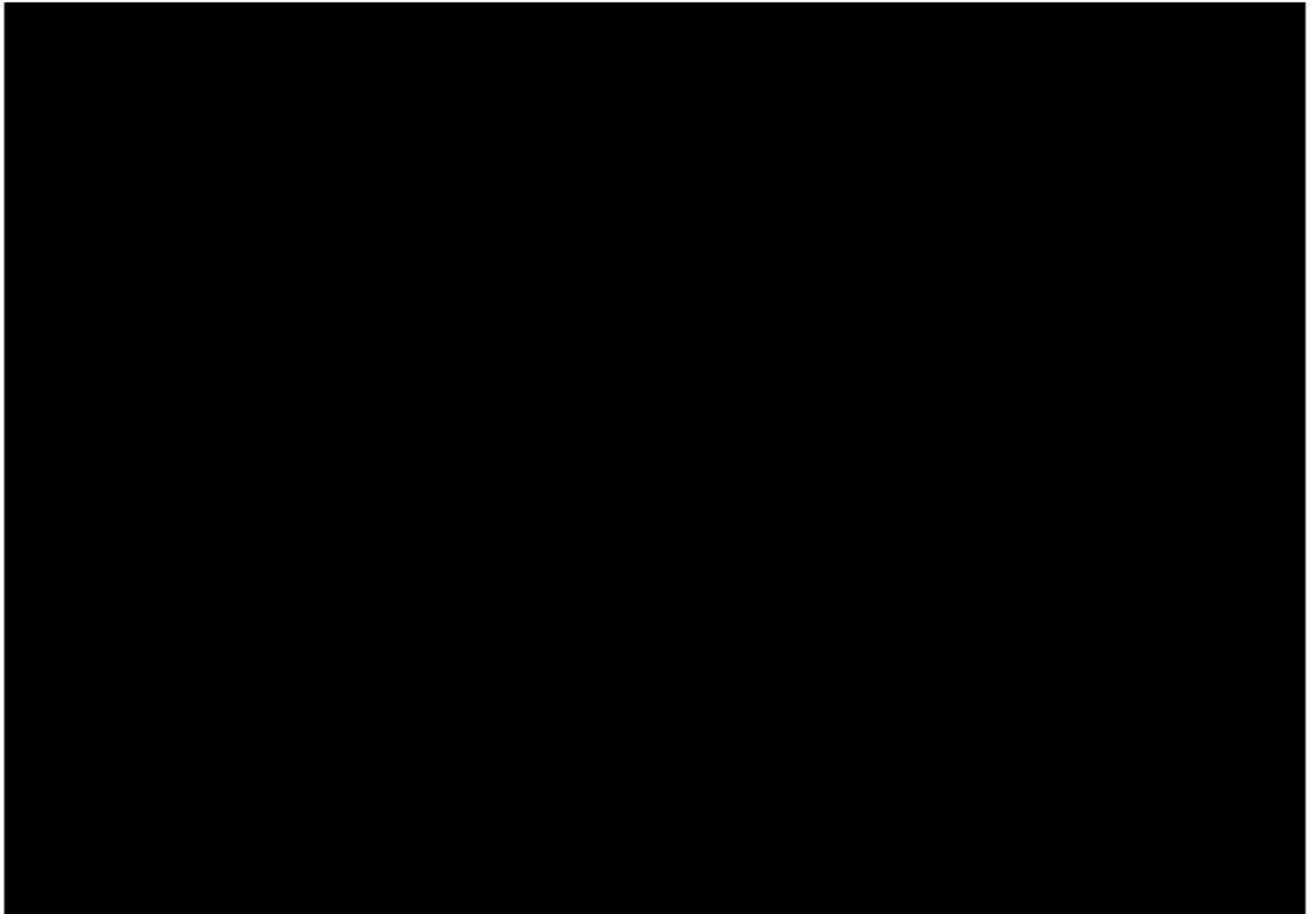
None of the ~~three~~ Plaintiffs that were enrolled in the Cobb County School District during the 2020-2021 school year attended in-person throughout the time that in-person instruction was offered. Thus, the District’s prior mask-mandate did

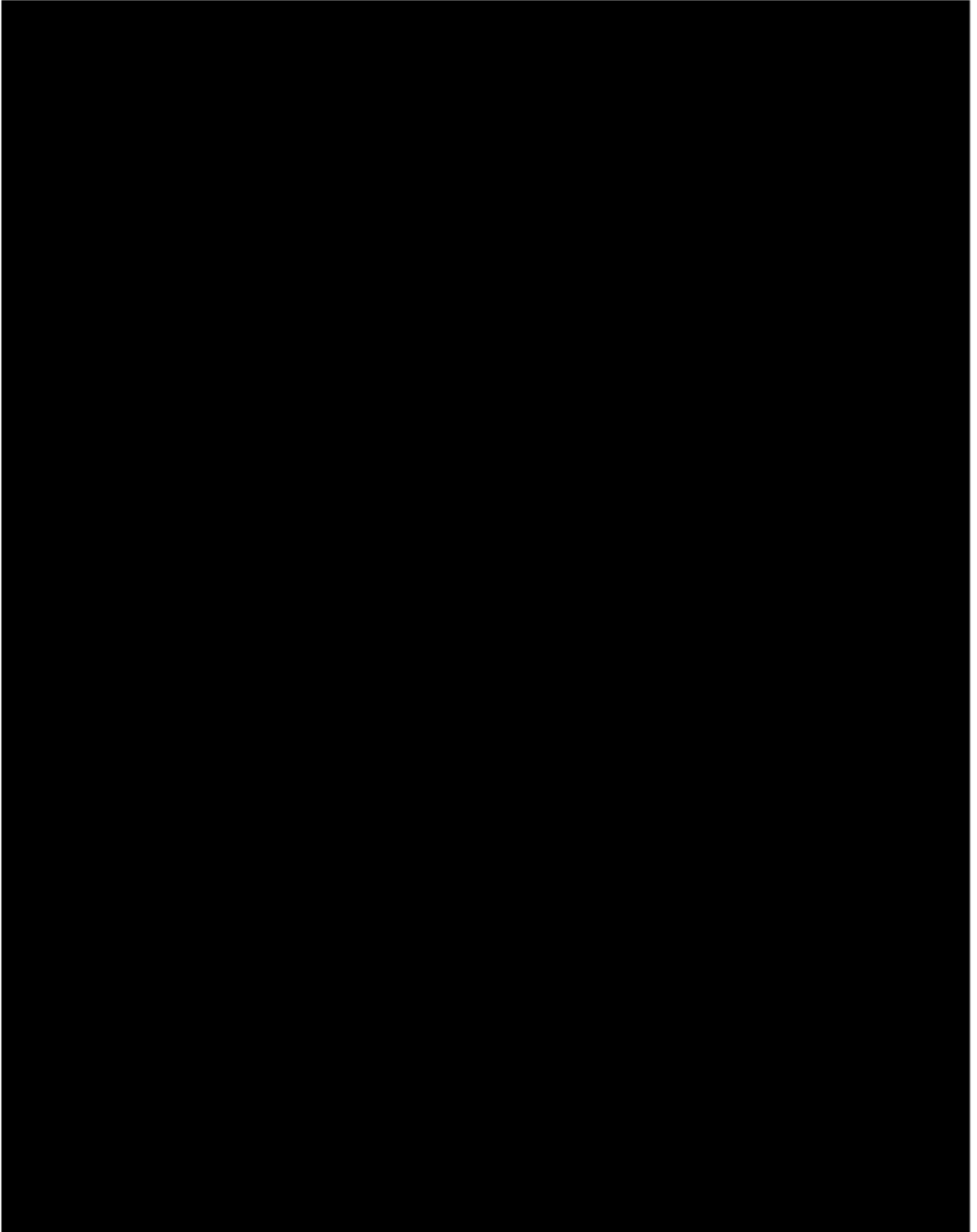
not enable any Plaintiff to attend in-person instruction.

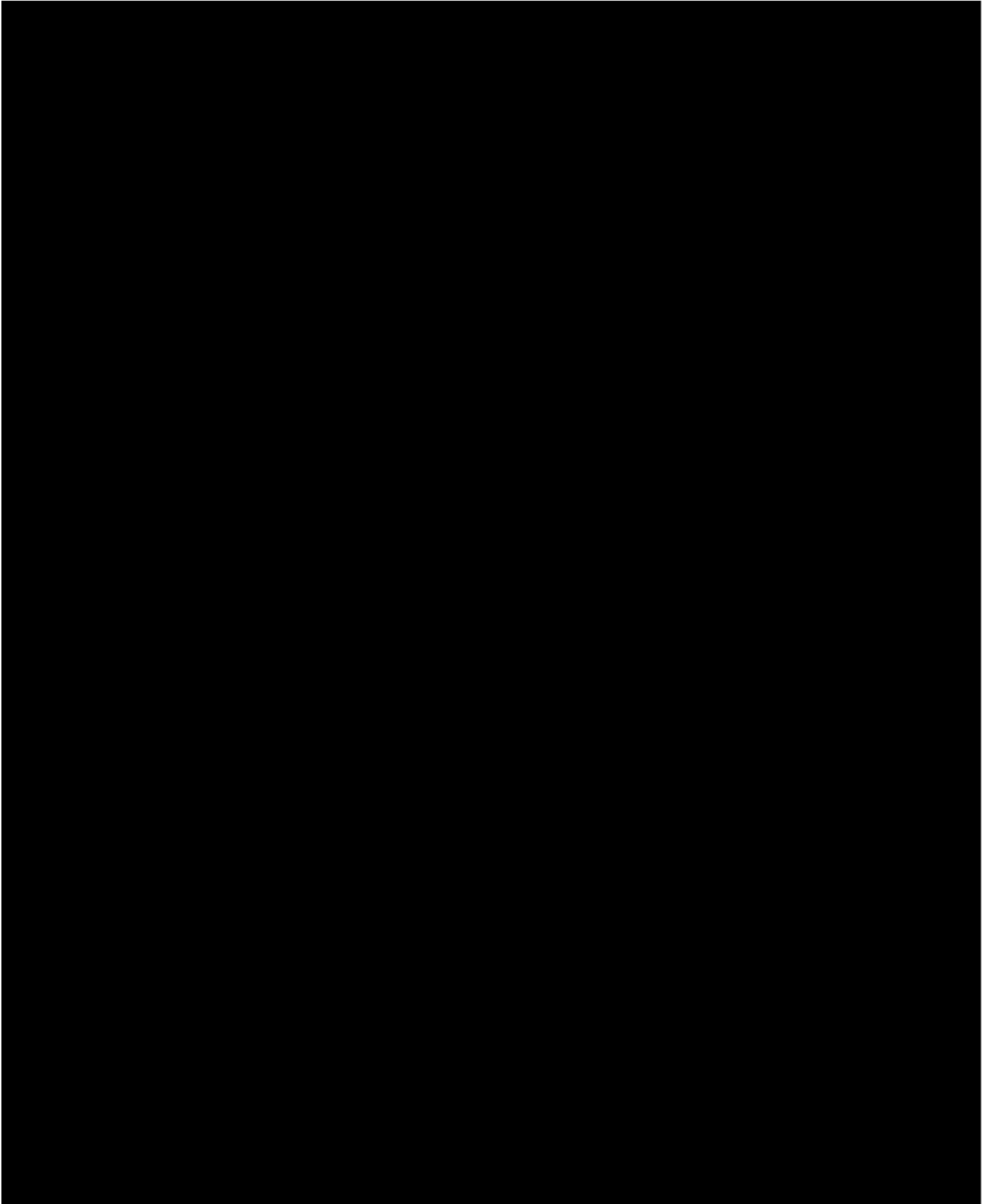
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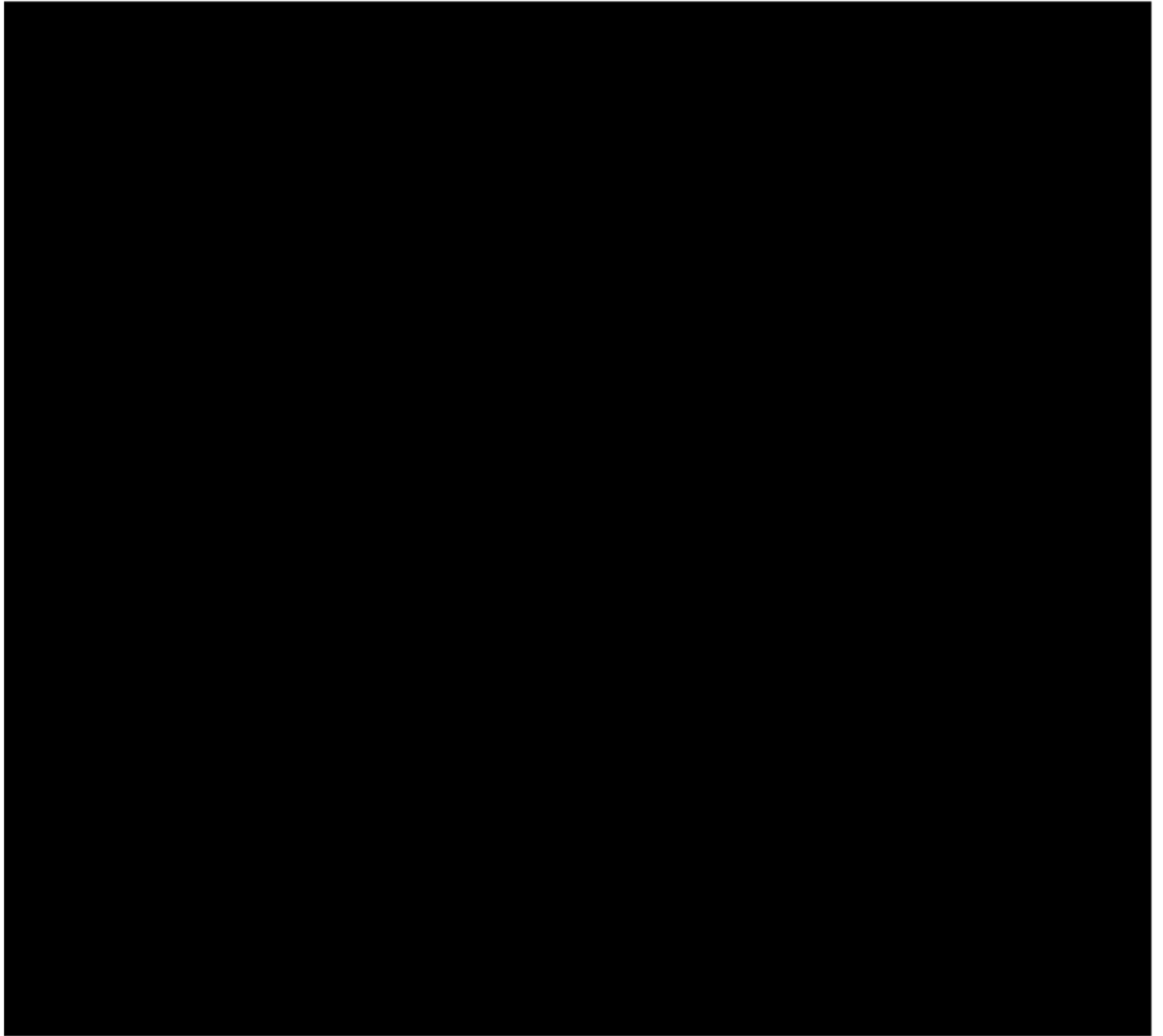
The Plaintiffs' 504 and IEP teams have met to make determinations on the unique needs of each student and the required supports, services, and accommodations that each individual student may require to access their education. These are individualized decisions and none of the Plaintiffs have the same circumstances or needs.

Plaintiff C.S.

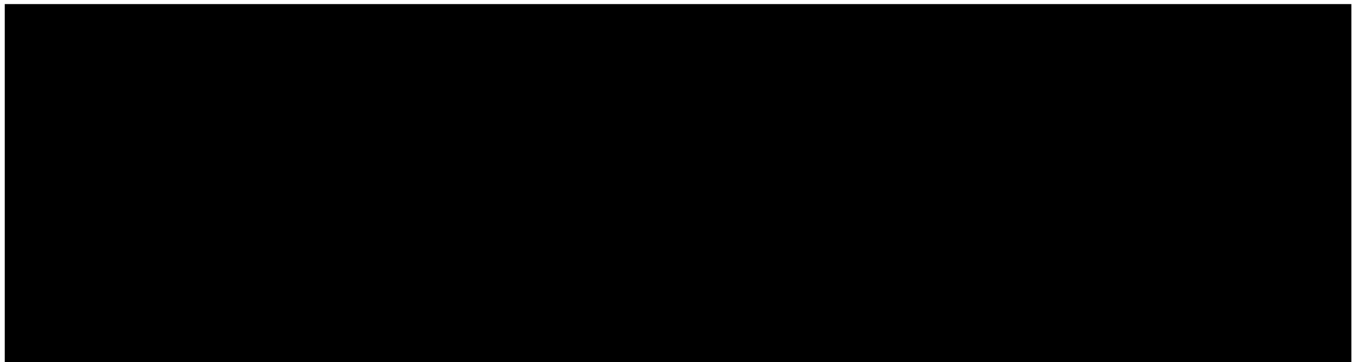


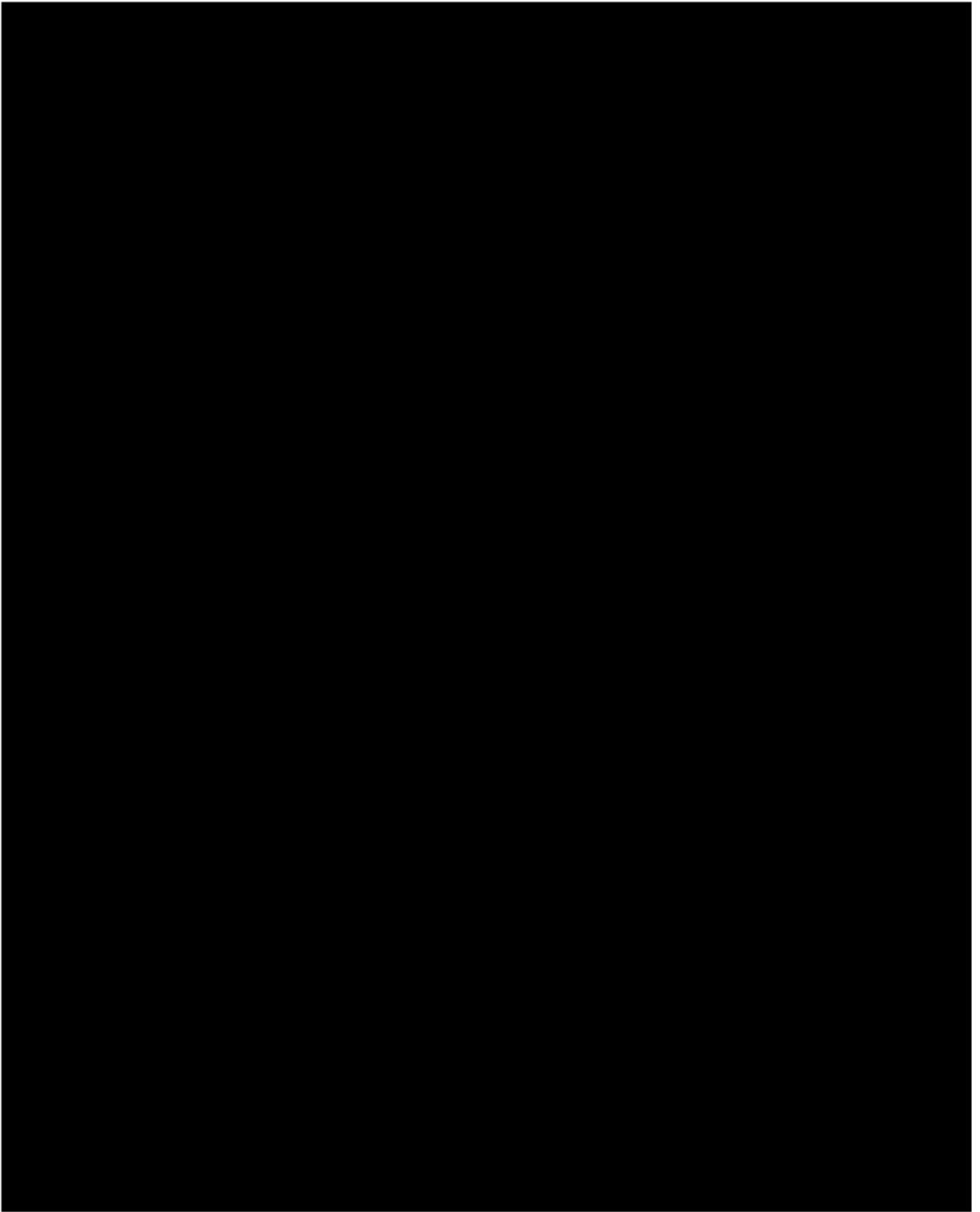


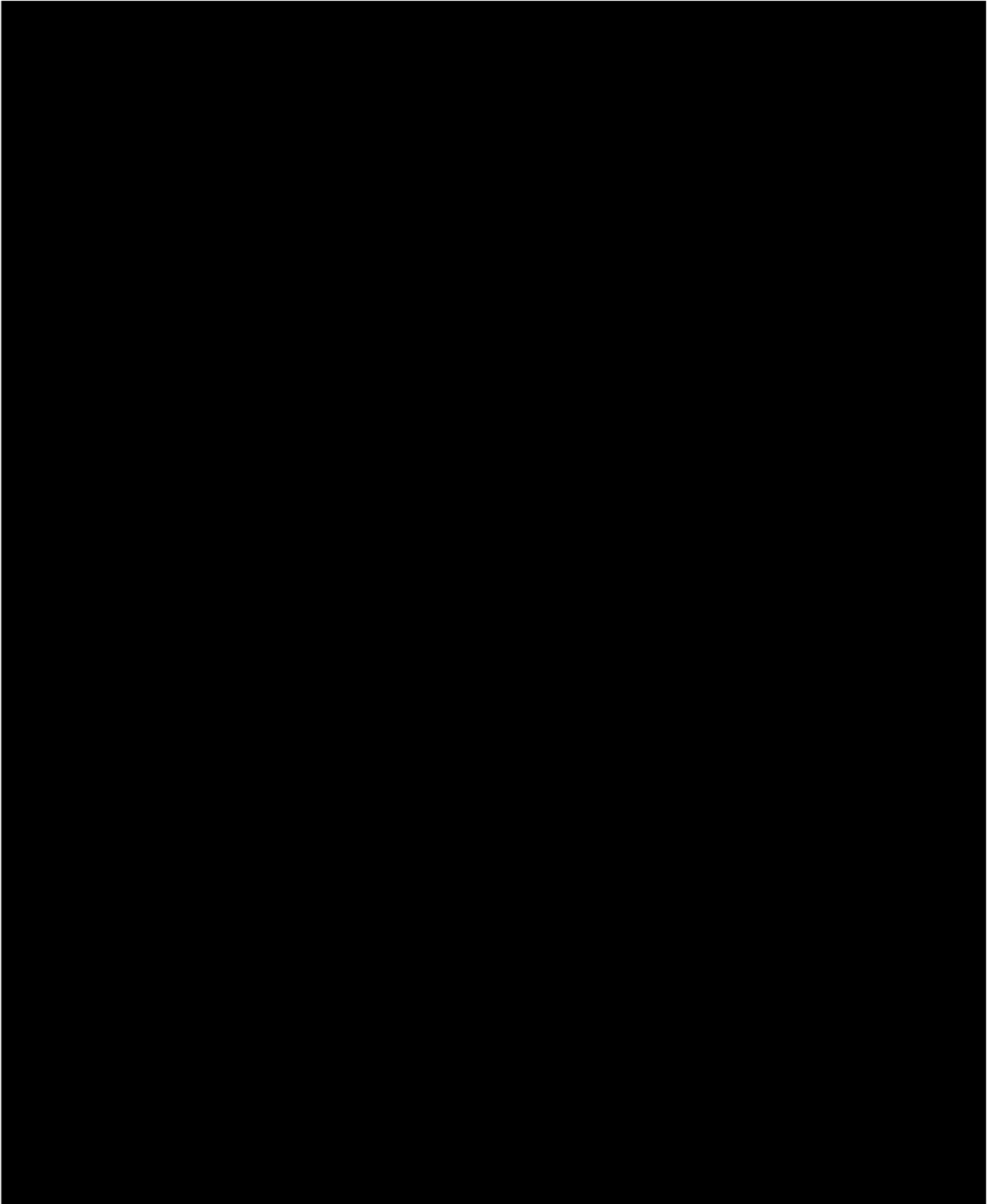


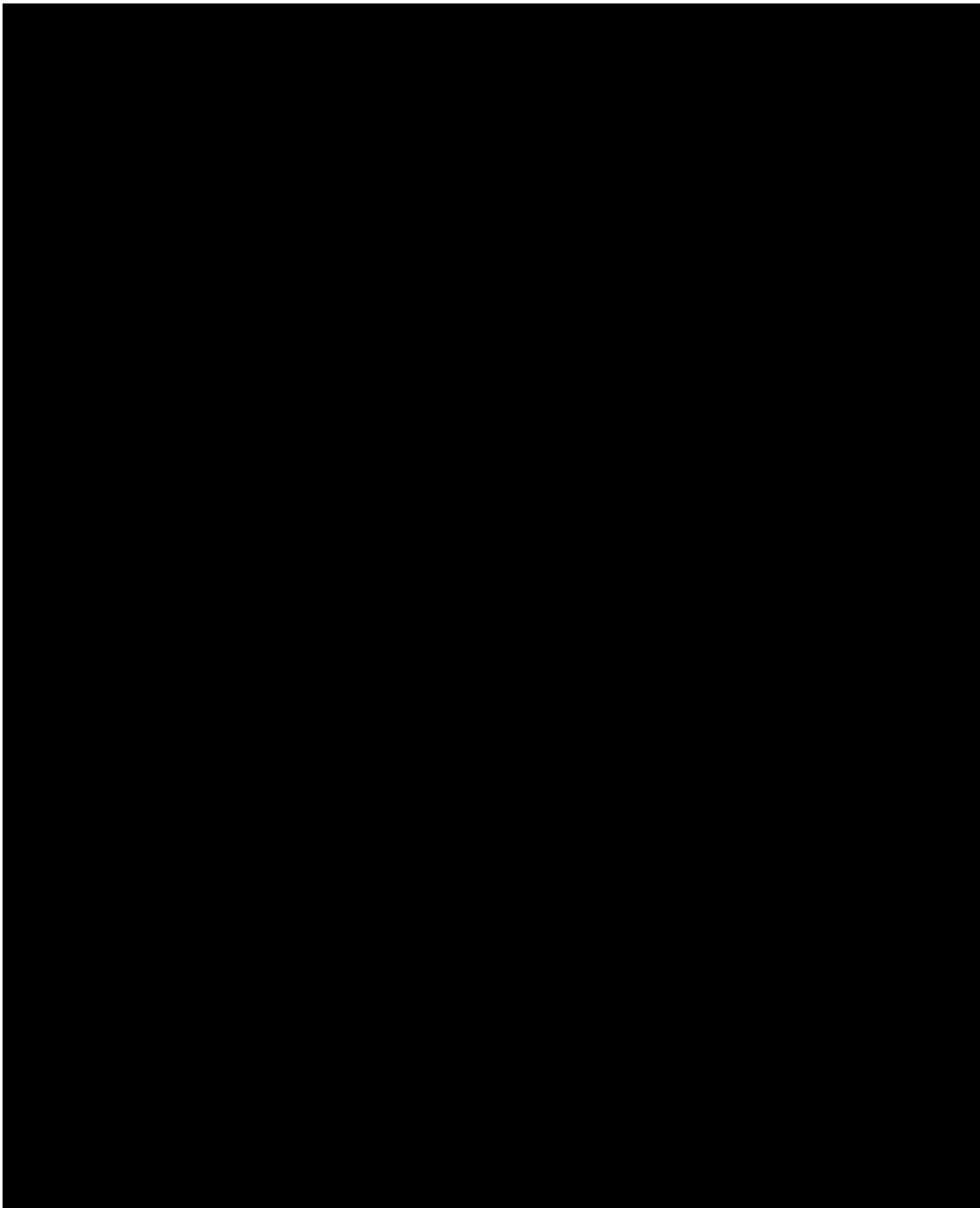


Plaintiff L.E.





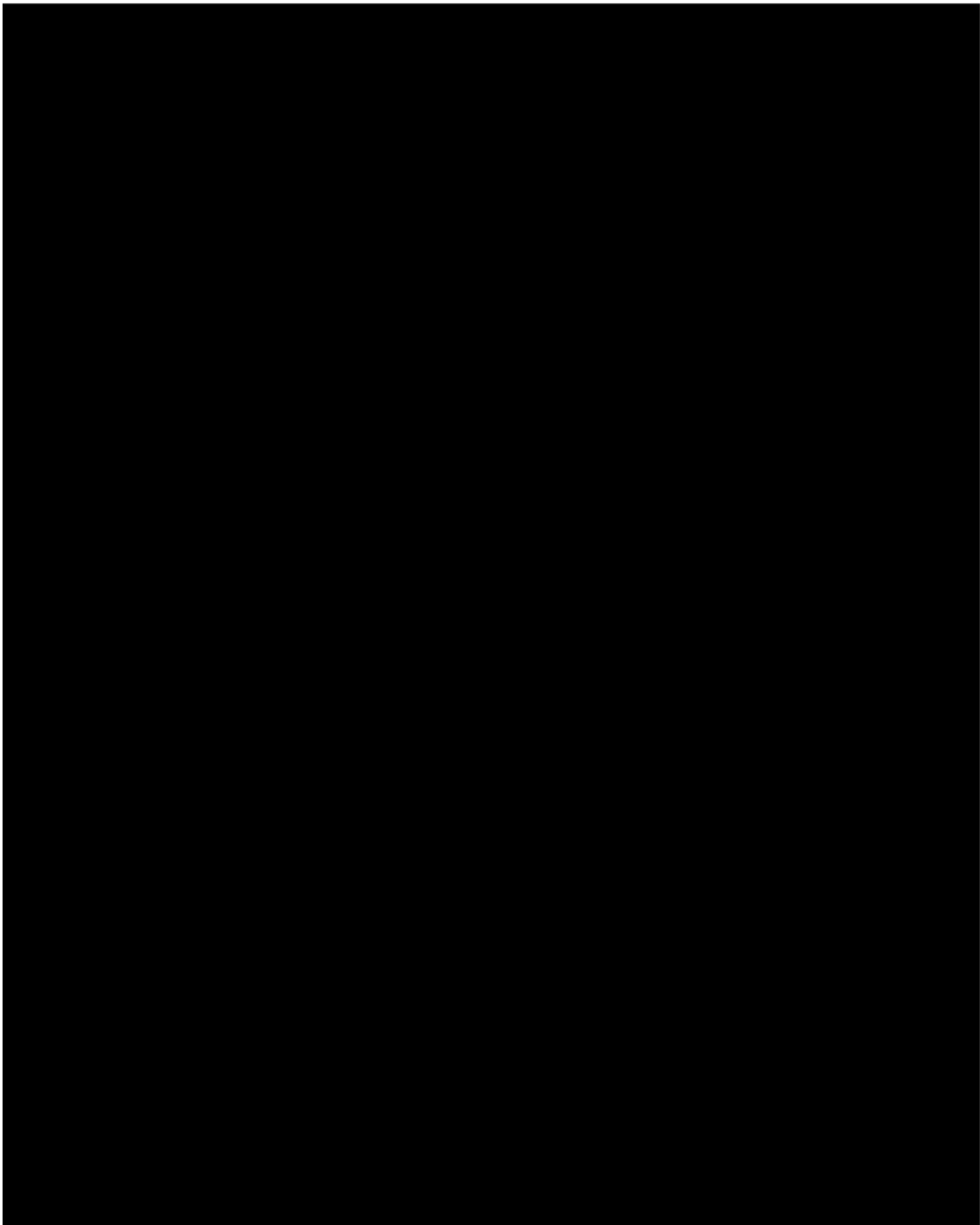


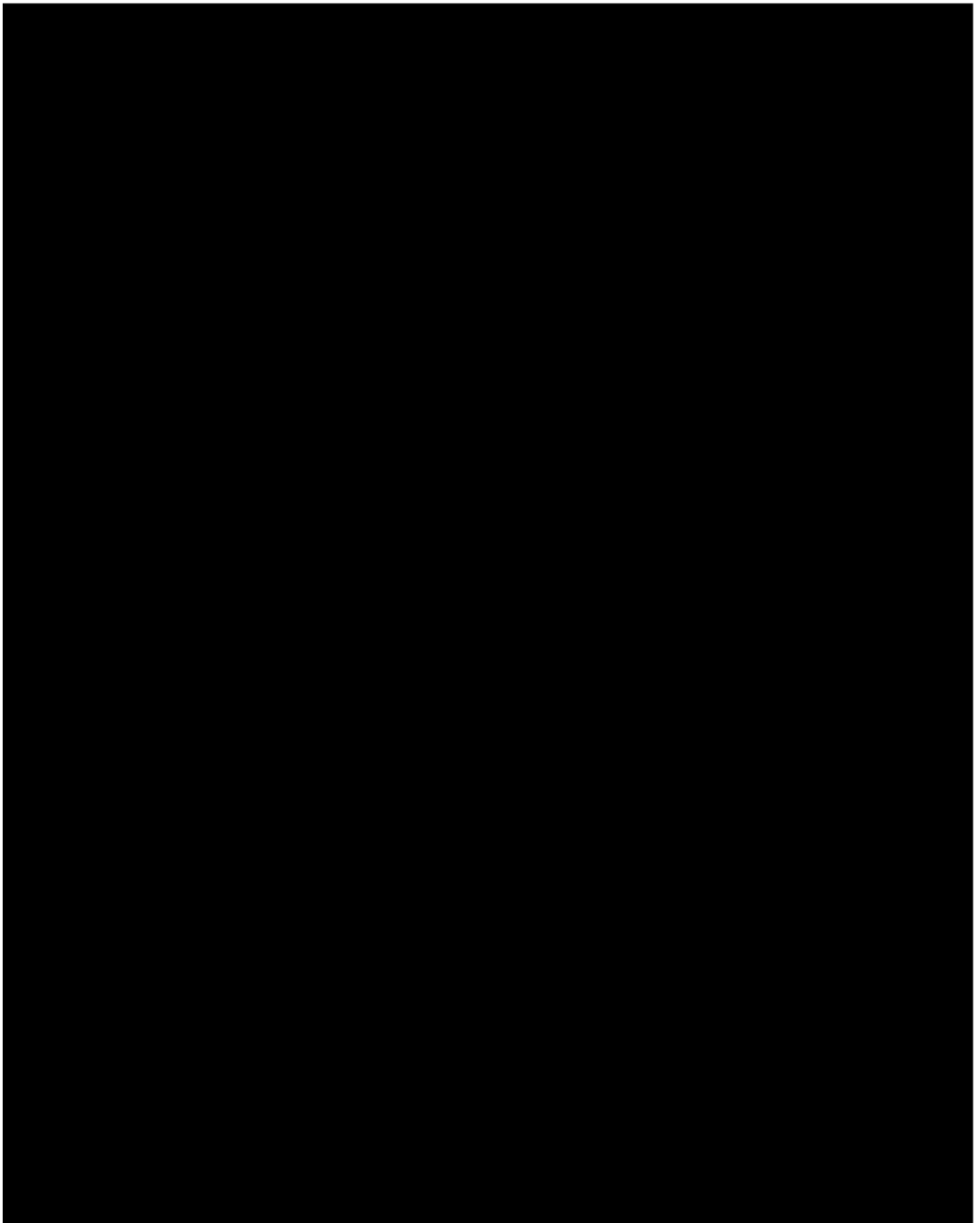


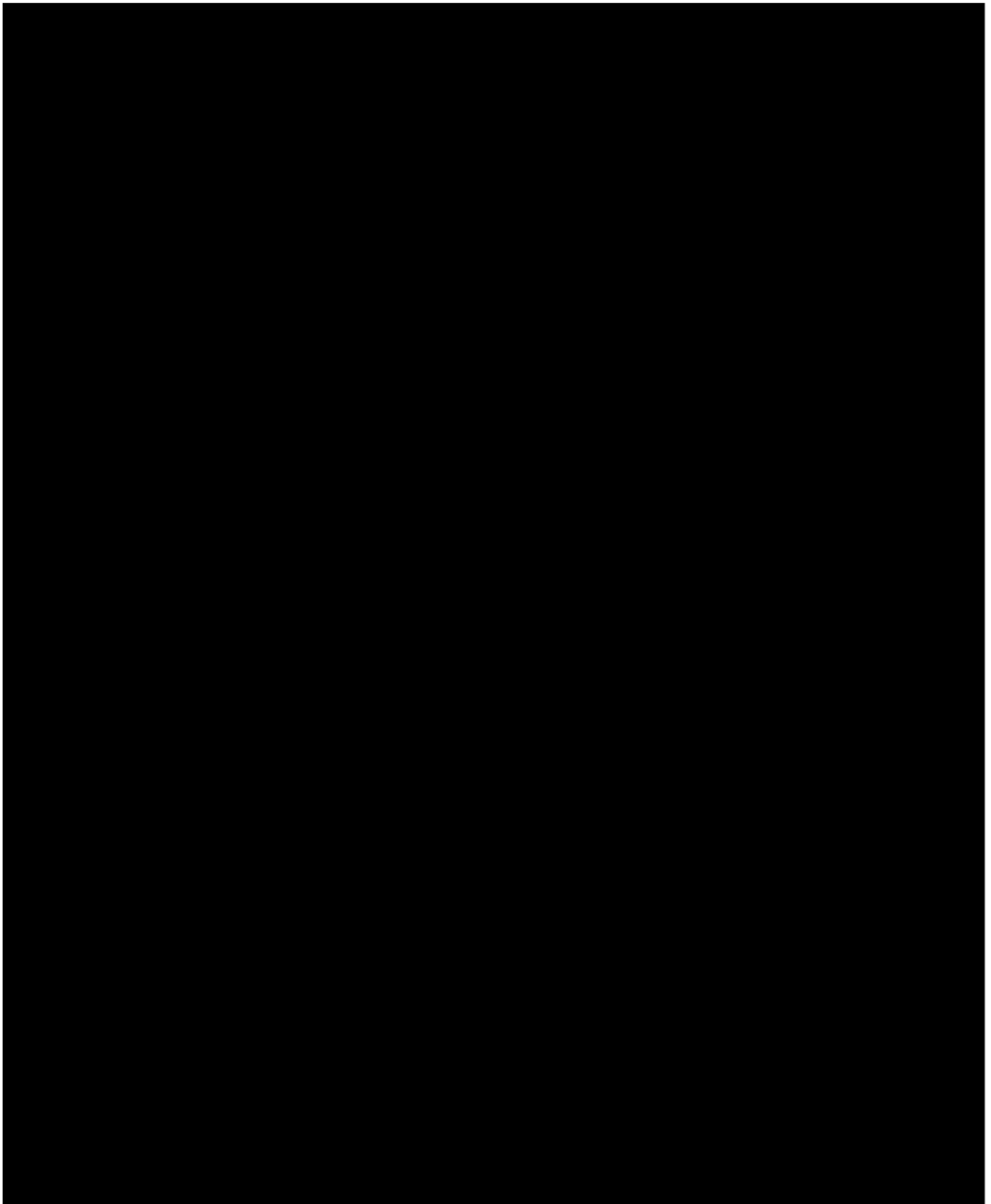
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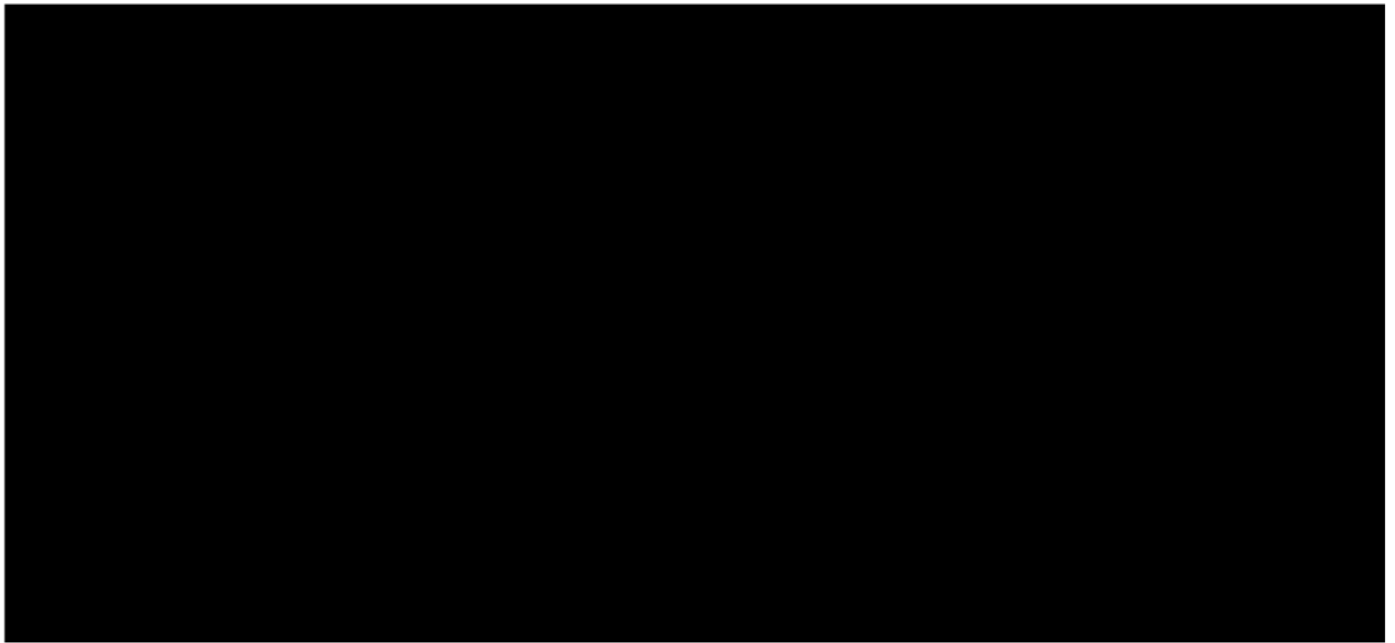
Plaintiff A.Z.

[REDACTED]

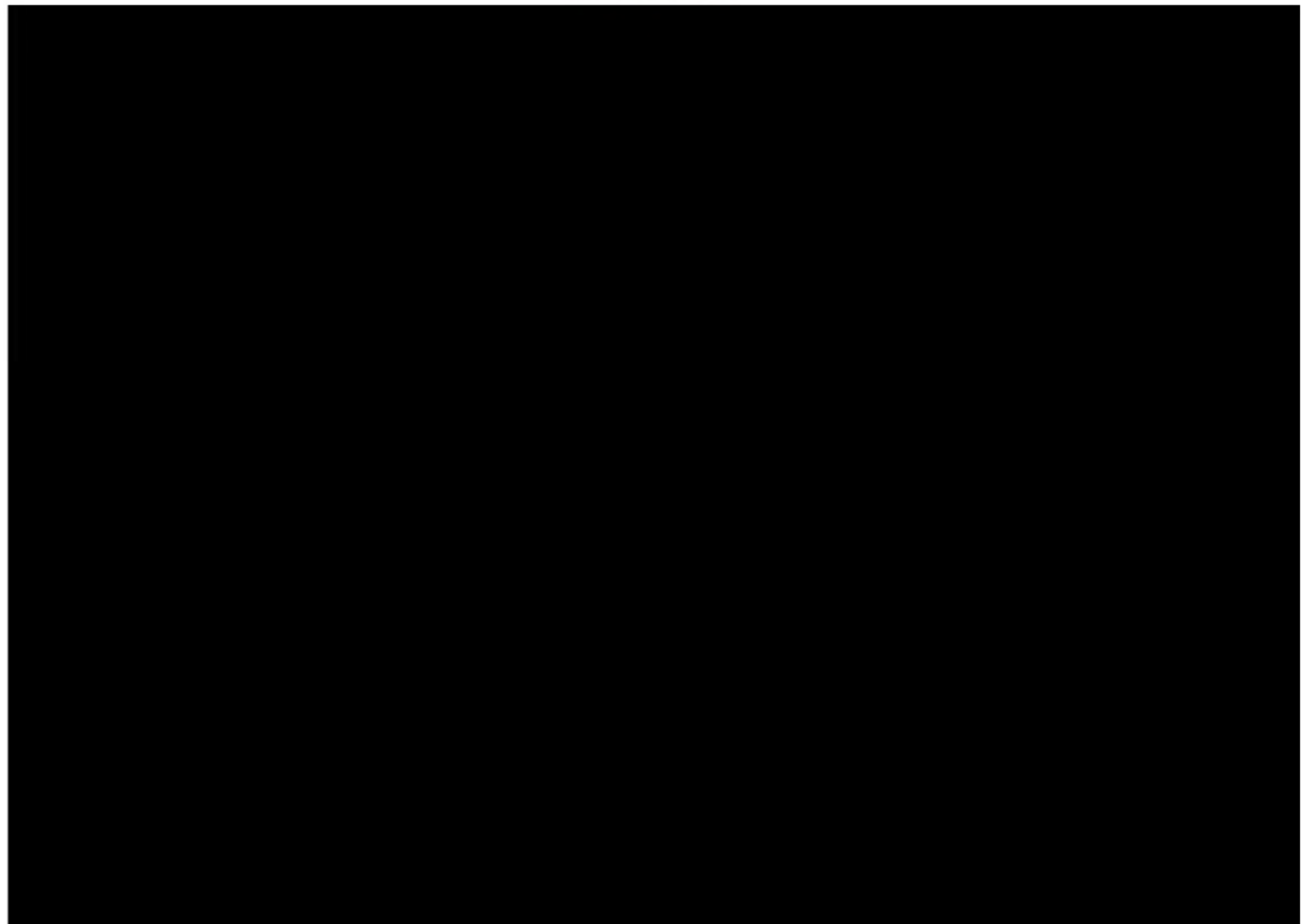


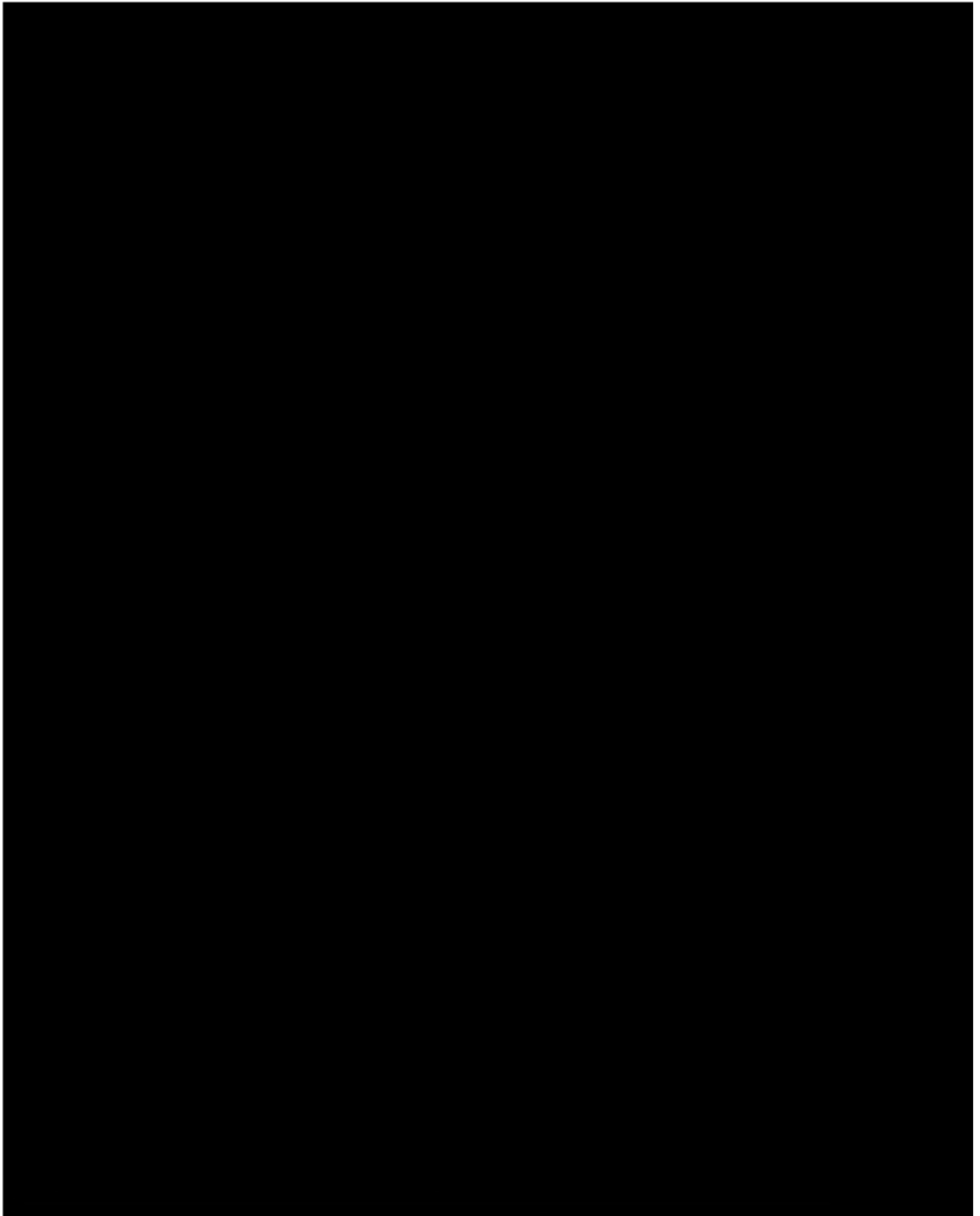


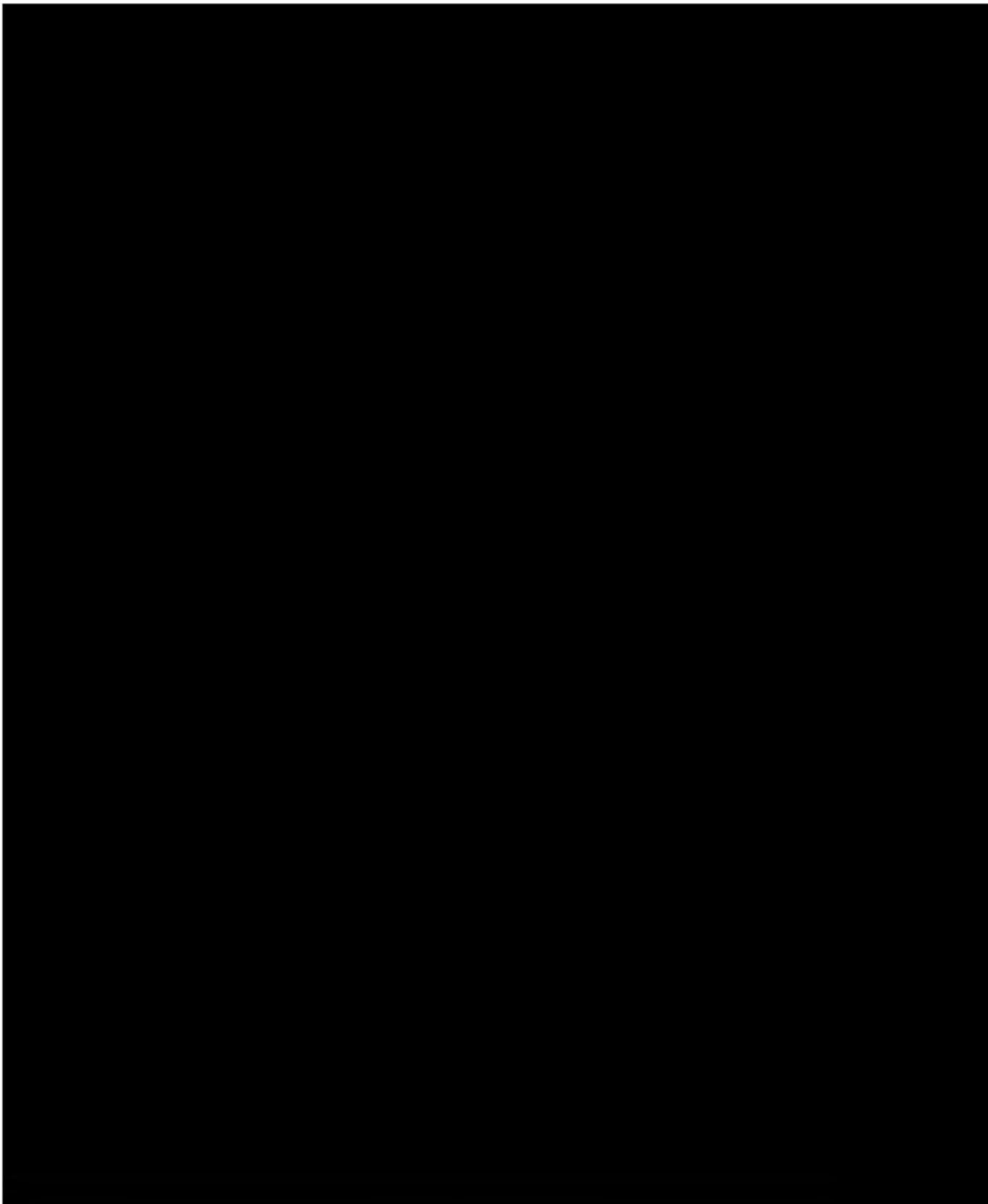


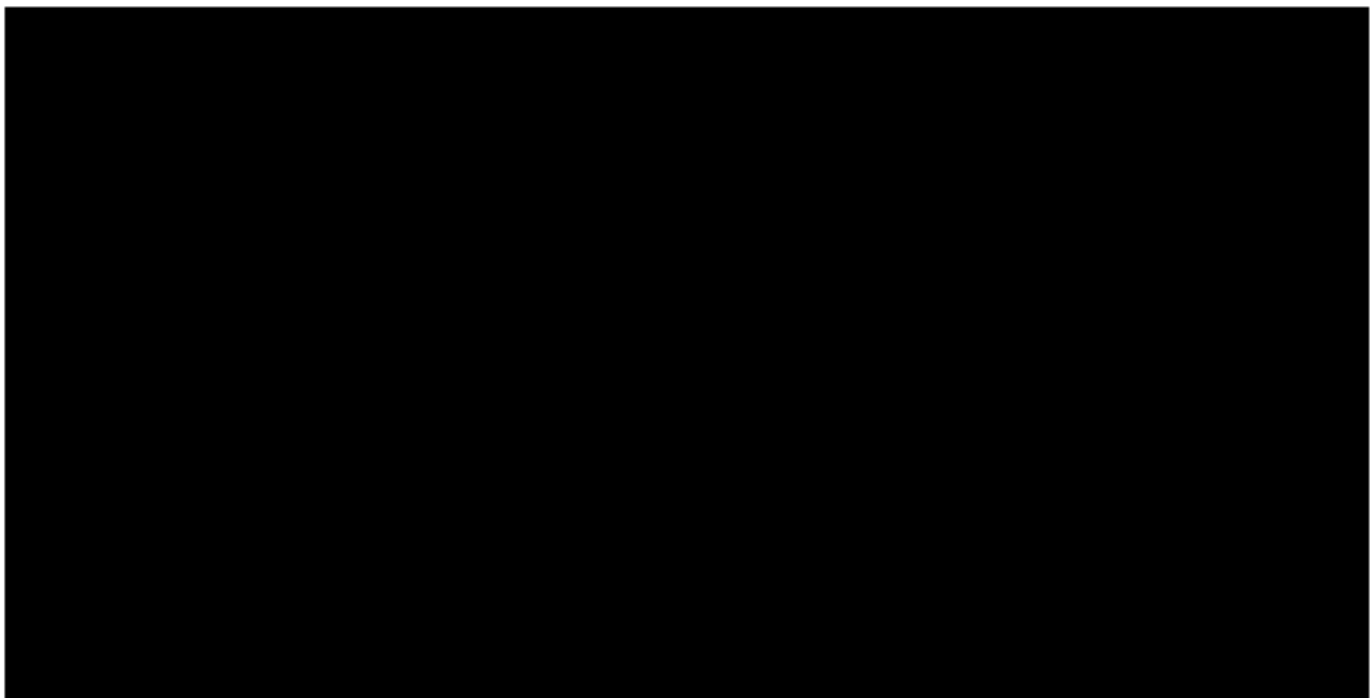


Plaintiff B.B.









50.

All of the Plaintiffs have received appropriate accommodations to enable them to access their education.

So sworn this 11th day of October, 2021.


JESSICA COLEMAN